



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAR 13 2013

Susan H. Shapiro, Esq.
21 Perlman Drive
Spring Valley, NY 10977

Dear Ms. Shapiro:

This is in response to your January 10, 2013 letter to the U. S. Environmental Protection Agency Region 2 (EPA) Administrator Judith Enck, which has been referred to my office for response. Your letter concerns the proposed Patrick Farms subdivision, to be constructed in the Town of Ramapo, Rockland County, New York. This project was the subject of an August, 2011 Environmentally Sensitive Area (ESA) special grant condition waiver approval issued by EPA Region 2, which allowed the project to connect to the federally-funded Rockland County SD#1 (RCSD#1) sewage treatment works. More specifically, your letter states that the wetlands delineation prepared in support of this project was not subject to a Jurisdictional Determination (JD) by the US Army Corps of Engineers (ACE), and that materials included with the waiver package provided to EPA by the RCSD#1 were therefore misleading and inaccurate. In consideration of the above, you request that EPA withdraws its waiver approval for this project

While the wetlands delineation was not subject to a JD, it did undergo scrutiny by the ACE as part of an enforcement action that began in 2004 and ended in 2007, which confirmed the boundaries of wetlands in regards to the proposed development as it existed at that moment in time. After a review of the information you provided in support of your letter, in order to avoid the potential ramifications of a violation of the ESA special grant condition should wetlands be filled as part of this project, we have strongly recommended to the RCSD#1 that the project sponsor obtain a JD from the ACE, and that it then be submitted to EPA for consideration and determination of whether a revised waiver approval will be needed (see enclosure).

We appreciate your interest in this matter. If you have any questions, or require additional information, please contact Steven Ferreira of my staff at x-3759.

Sincerely yours,

A handwritten signature in black ink, reading "Judy Ann Mitchell".

Judy-Ann Mitchell, Chief
Sustainability & Multimedia Programs Branch

Enclosure

bcc: J. Cantilli, CWD-WMB
D. Montella, CWD-WMB
G. Musumeci, CASD-SMP
S. Ferreira, CASD-SMBP
J. Filippelli, CASD
D. Boykin, OPM (R2—13-000-0412-RA)
S. Mason-Scott, CASD
E. Johnson, CASD-SMPB

Saved As: G:\user\share\deppdiv\ERS\Staff\Ferreira\CY 2013\Shapiro.docx
Save To: G:\usershare\spm\ERS\Ersfinals\Waivers\NY\Rockland County SD#1\Shapiro.docx

CASD-SMPB:FERREIRA:02/12/13:03/13/13:x3759



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAR 11 2013

Dianne T. Philipps, P.E.
Executive Director
Rockland County Sewer District No. 1
4 Route 340
Orangeburg, New York 10962

Dear Ms. Philipps:

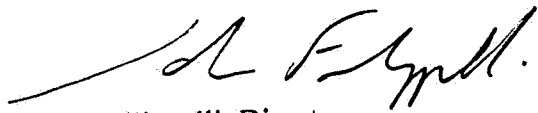
On March 22, 2011, you requested that the U.S. Environmental Protection Agency (EPA) waive the special condition placed on the Rockland County Sewer District No. 1 (RCSD#1) construction grant (Project Number C-36-745), restricting sewer connections from new development in environmentally sensitive areas (ESA). Specifically, your waiver request concerned the Patrick Farm project, a proposed 496 residence subdivision to be constructed on 208.5 acres in the Town of Ramapo [Tax Lots 3./12A1 (32.11-1-15 & 16), and 3./13A2 (32.11-1-4 & 14 and 32.14-2-3)].

On August 18, 2011, the EPA approved a partial waiver of the ESA special grant condition for this project. Our approval was based on the information that was provided in support of your request indicating that the proposed development would not infringe upon wetlands. As noted in our letter, the sewer connection restriction was to remain in effect for the wetlands on this site. Subsequently, EPA became aware of questions regarding the actual extent of wetlands on the referenced lots. Accordingly, on January 5, 2012, we notified you that the wetlands issue was being examined further, and the grant condition restriction remained in place for all site wetlands.

We have recently been informed that the extent of project area wetlands was not subject to verification through a U.S. Army Corps of Engineers issued jurisdictional determination (JD). Considering the questions about the extent of project area wetlands that have recently been raised, as well as the time that has passed since completion of the existing site delineation, we are concerned about the possible environmental ramifications if it is determined that the delineation included within your waiver request package is found to be inaccurate. If site wetlands are unexpectedly disturbed during construction of this project, our waiver approval would be invalid. Further, the RCSD#1 would be in violation of the ESA grant condition if it subsequently allowed this project to hook up to the federally-funded sewer treatment works constructed under Project Number C-34-745. Accordingly, we believe it would be in the best interest of both the project sponsor and the RCSD#1 for the project sponsor to obtain a JD from the ACE, confirming the current extent of wetlands on these parcels. This JD should then be sent to EPA for our review and determination of whether a revised waiver approval will be needed.

We appreciate your assistance in this complicated matter. If you have any questions, or would like additional information, please feel free to contact Steven Ferreira of my staff at (212) 637-3759.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Filippelli". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

John Filippelli, Director
Clean Air and Sustainability Division

cc: Scenic Development, L.L.C.
Dennis Rocks; Leonard Jackson Associates

MILTON B. SHAPIRO
SUSAN HITO SHAPIRO
Attorneys at Law

21 Perlman Drive
Spring Valley, New York 10977

Phone: 845-371-2100
Fax: 845-371-3721
E-mail: mbst@ourrocklandoffice.com

1/10/13

Ms. Judith Enck
Regional Administrator, Region 2
Environmental Protection Agency
290 Broadway
New York, NY 10007-1866
Fax: (212) 637-3526/ enck.judith@epa.gov

RE: ACOE Wetland Delineation/Jurisdiction Determination
PATRICK FARM PROJECT
Town of Ramapo, Rockland County, New York

Dear Judith:

On 10/27/10, I originally contacted about serious environmental concerns raised by the proposed 497 unit high density multi-family housing project on Patrick Farm which overlays the headwaters and recharge basin of the interstate Ramapo-Mahwah River Basin Sole Source Aquifer System, designated by the US EPA on 8/28/1992 ("SSA") which supplies drinking water, via public and private wells, to more than 1 million people in New York and New Jersey.

On January 16, 2013 the Planning Board of the Town of Ramapo has scheduled Final Site Plan Approval at 6:30 PM (*see attached notice*). Based on historical actions, the Town of Ramapo's Planning Board will grant final approval on January 16, 2013, without question, despite the 12 pending SEQR lawsuits; and the January 7, 2013 NYS DEC hearing to determine whether an adjudicatory hearing is warranted.

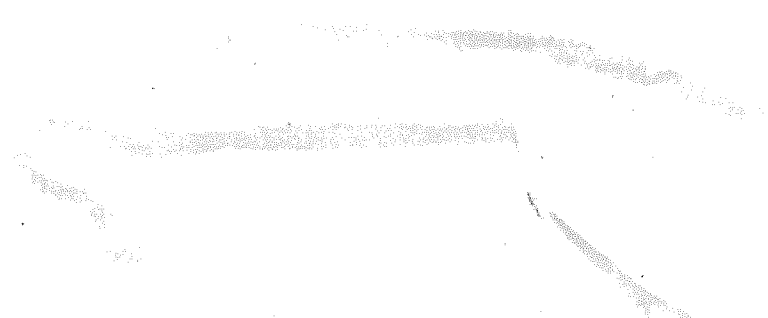
Upon obtaining Ramapo's approval of final subdivision and site plan the Applicant will move quickly to clear cut, re-grade, make impermeable and cause irreparable harm to the pristine re-charge basin at the headwaters of the Ramapo-Mahwah SSA.

Therefore, I am bringing to you attention the recent confirmation from the Army Corps of Engineers (ACOE) that, despite the Applicant's continued assurances, **no approved wetland delineation or Jurisdictional Determination from ACOE exists for the Patrick Farm.**

"[] in response to your Freedom of information Act request regarding all ACOE documents



1900



1900

LJA | **Leonard Jackson Associates**

Consulting Engineers

26 Firemans Memorial Drive . Pomona, New York 10970 . (845) 354-4382 . FAX (845) 354-4401

Dear Sir or Madam:

This letter is to advise you we have an application pending before the **PLANNING BOARD** of the **TOWN OF RAMAPO** concerning property within 500 feet of your property.

This meeting will be held on: Wednesday, January 16, 2013

At: Town of Ramapo, 237 Route 59, Suffern, New York

Time: 8:00 p.m.

We are enclosing a portion of the Legal Notice, which was published in the Rockland County Times, and hope that it will answer your immediate questions concerning the application. Also attached is a drawing showing the proposed site (indicated by the cross hatched area) and the surrounding property (indicated by the lighter area).

There is no requirement that you attend this meeting. However, it is your right to appear to support or object to the case before the **PLANNING BOARD**, or to have a duly authorized representative or attorney appear on your behalf.

Should you have any questions about the application, you may stop by the Town of Ramapo Planning Department and inspect the file. You may also, of course, contact the undersigned to answer your questions.

Scenic Development LLC
Name of Applicant or Representative

Courts have ruled that it is improper for anyone to contact any members of the **PLANNING BOARD** before or after the hearing.

NOTICE OF HEARING

Leonard Jackson PE PLLC dba Leonard Jackson Associates

NOTICE IS HEREBY GIVEN that a Public Hearing will be held by the Planning Board of the Town of Ramapo:

At: Town of Ramapo, 237 Route 59, Suffern, New York

Date: Wednesday, January 16, 2013

Time: 8:00 p.m.

LEGAL NOTICE

Application of Scenic Development, LLC, 3 Ashel Lane, Monsey, New York for a Final Site Plan Approval of a drawing entitled Patrick Farm Volunteer Housing consisting of 24 residential rental units for community service volunteers on 5.065 acres. The property in question is located on the east side of Route 202, 0 feet south of Route 306, which is known and designated on the Ramapo Tax Map as Sections 32.11-1-12, 32.11-1-13, 32.11-1-14, 32.11-1-16, 32.11-1-2, 32.11-1-3, 32.11-1-4, 32.15-2-1 and 32.14-2-3, in an R40 and MR8 zones.

Application of Scenic Development, LLC, 3 Ashel Lane, Monsey, New York for a Final Site Plan Approval of a drawing entitled Patrick Farm Condominiums, consisting of 314 market rate Townhouses and 72 "work force flats," on 51.459 acres. The property in question is located on the east side of Route 202, 0 feet south of Route 306, which is known and designated on the Ramapo Tax Map as Sections 32.11-1-12, 32.11-1-13, 32.11-1-14, 32.11-1-16, 32.11-1-2, 32.11-1-3, 32.11-1-4, 32.15-2-1 and 32.14-2-3, in an R40 and MR8 zones.

Copies of the above application are on file at the Town of Ramapo Planning Department and may be reviewed by interested parties during normal office hours.

By Order Of
Town of Ramapo Planning Board Chairman, Sylvain Klein

Dated at Suffern, New York
January 4, 2013



DEPARTMENT OF THE ARMY
NEW YORK DISTRICT, CORPS OF ENGINEERS
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, N.Y. 10278-0090

REPLY TO
ATTENTION OF

JAN 07 2013

Office of Counsel

SUBJECT: Freedom of Information Act Request No. FA-12-0040

Deborah Seidman Munitz
5 Rose Hill Road
Suffern, NY 10901

Dear Ms. Munitz:

This is in response to your Freedom of Information Act request regarding all ACOE documents confirming the delineated and flagged boundaries of all Federal Jurisdictional wetlands on the Patrick Farm site prepared in accordance with methodology provided in 1987 ACOE wetlands Delineation Manual and later editions. This is additional information to documents requested in FOIA FA-13-0035 requested on December 06, 2012.

Please be advised that no Jurisdictional Determination had been done.

A "no records" response is an "adverse determination" under 5 U.S.C. 552(a)(6)(A)(i) since the requester did not receive the documents it requested. Oglesby v. Department of the Army, 920 F2d 57, 67 (D.C. Cir. 1990). As a result, a requester wishing to challenge the adequacy of the search must have the opportunity to appeal a "no records" response to the head of the agency. In the present situation, the undersigned is the Initial Denial Authority for "no records" denial. You have the right to appeal this determination through our office to the Secretary of the Army.

An appeal must be received within 60 days of the date of this letter. The envelope containing the appeal should bear the notation "Freedom of Information Act Appeal" and should be sent to:

U.S. Army Engineer District, New York,
ATTN: Office of Counsel, Room 1837
26 Federal Plaza
New York, NY 10278

According to applicable regulations, there are no assessable fees.

Sincerely,

Lorraine Lee

Lorraine Lee
District Counsel
Initial Denial Authority
Freedom of Information Act Officer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1868

AUG 18 2011

Dianne T. Philipps, P.E.
Executive Director
Rockland County Sewer District No. 1
4 Route 340
Orangeburg, New York 10962

Dear Ms. Philipps:

This is in response to your March 22, 2011 request to the U.S. Environmental Protection Agency (EPA) for a waiver from the special condition placed on the Rockland County Sewer District No. 1 construction grant (Project Number C-36-745), restricting sewer connections from new development in environmentally sensitive areas (ESAs). Specifically, this request concerns the "Patrick Farm" subdivision, to be constructed on Tax Lots 3./12A1 (32.11-1-15 & 16), and 3./13A2 (32.11-1-4 & 14 and 32.14-2-3), located in the Town of Ramapo, Rockland County, New York. According to the documentation provided in support of this request, the proposed project involves the construction of 496 residences, including 86 single-family residences and 410 multi-family residences, with associated driveways, sidewalks and roadways, on 208.5 acres.

We have carefully evaluated the information you have provided us. This includes the following plans:

- ♦ "Layout Plan (1 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated May 12, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ♦ "Layout Plan (2 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated May 12, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ♦ "Regulatory Impact Area Map (1 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated June 24, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ♦ "Regulatory Impact Area Map (2 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated June 24, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ♦ "Mitigation Plan, Patrick Farm, Town of Ramapo, Rockland County, New York," dated June 29, 2010, last revised on January 28, 2011, and prepared by both Leonard Jackson Associates and Carpenter Environmental Associates, Inc.;

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 50% Postconsumer content)

THE UNIVERSITY OF CHICAGO

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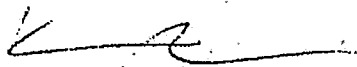
- ♦ "Wetland Location Map, Scenic Development, LLC, Town of Ramapo, Rockland County, New York," dated October 22, 2009, unrevised, and prepared by Atzl, Scatassa & Zigler P.C.; and
- ♦ "Ecological Communities, KLM Properties, City of Ramapo, Rockland County, New York," dated August 24, last revised on June 23, 2010, and prepared by Carpenter Environmental Associates, Inc.

The information provided indicates that the proposed development will not infringe upon delineated wetlands. Therefore, I approve a partial waiver of the grant condition for this project as noted in the above site plans. Please note however, that the sewer connection restriction will remain in effect for the wetlands on this site. Any modification to this project resulting in disturbance to site wetlands will require a resubmittal of this application to the EPA for a revised determination. Moreover, this waiver does not relieve the property owner from compliance with any other federal, state, or local requirements.

As part of a national effort to sustain healthier families, cleaner communities, and a stronger America, EPA would like you to inform the developers, as well as their consultants/contractors, about alternative/green building materials and practices as well as energy- and water-efficient products, and has enclosed *U.S. EPA Region 2 Green Recommendations*. Some of these recommendations are directly applicable to this project while some may be applicable to other projects. Please feel free to share the information.

We commend efforts to use green building/energy-efficient/water-efficient products and would appreciate being made aware of their usage. If you have any questions concerning this matter or would like additional information, please feel free to contact Steven Ferreira of my staff at (212) 637-3759.

Sincerely,



Kevin Bricke, Acting Director
Division of Environmental Planning and Protection

Enclosure

cc: Scenic Development, L.L.C.
Derinis Rocks, Leonard Jackson Associates

U.S. EPA Region 2 Green Recommendations¹

Recommendations:

To the maximum extent possible, projects are encouraged to use local and/or recycled materials; to recycle materials generated onsite; and to utilize low emissions technology and fuels. Further, they should use, to the extent feasible, renewable energy (including, but not limited to solar, wind, geothermal, biogas, and biomass) and energy efficient technology in the design, construction, and operation of transportation, building, and infrastructure projects.

- **ENERGY STAR/Multi-media green building and land design practices**
Require green building practices which have multi-media benefits, including energy efficiency, water conservation, and healthy indoor air quality. Apply building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense for stimulus funded building construction. Third party high-bar, multimedia standards should be required for building construction and land design (LEED and Sustainable Sites Initiative, Collaborative for High Performance Schools (CHPS), or local equivalent).
<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=64>
http://www.energystar.gov/index.cfm?c=business.bus_bldgs
http://www.energystar.gov/index.cfm?c=bldrs_lenders_raters.nh_jap
- **Encourage water conservation in building construction**
Promote the use of water-efficient products to be used in new building construction through the use of WaterSense-labeled products and the use of contractors certified through a WaterSense-labeled program. <http://www.epa.gov/watersense/water/fed-agency.htm>
- **Encourage Low Impact Development to help manage storm water**
Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product. <http://www.epa.gov/nps/lid/>
- **Alternative and Renewable Energy**
The Department of Energy's "Green Power Network" (GPN) provides information and markets that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy.
http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml?state=NJ

¹ "Green" here means environmentally sound practices in general and is not equivalent to the specific "green infrastructure" requirements in the American Recovery and Reinvestment Act (ARRA). Please note that this list is not meant to be all inclusive.

- **Ensure clean diesel practices**

Implement diesel controls, cleaner fuel, and cleaner construction practices for all on- and off-road equipment used for transportation, soil movement, or other construction activities, including:

- 1) Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits;
- 2) Use of ultra low sulfur diesel fuel in nonroad applications ahead of the mandate; and
- 3) Use of the cleanest engines either through add-on control technologies like diesel oxidation catalysts and particulate filters, repowers, or newer, cleaner equipment

Encourage entities to consider adopting contract specifications requiring advanced pollution controls and clean fuels. A model spec is online at (applies to both on and non-road engines):

<http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>

Additional Information: <http://www.epa.gov/diesel/construction/contract-lang.htm>

How to guide: <http://www.mass.gov/dep/air/diesel/connetro.pdf>

- **Promote the use of recycled materials in highway and construction projects**

Many industrial and construction byproducts are available for use in road or infrastructure construction. Use of these materials can save money and reduce environmental impact. The Recycled Materials Resource Center has developed user guidelines for many recycled materials and compiled existing national specifications.

<http://www.recycledmaterials.org/tools/uguidelines/index.asp>

<http://www.recycledmaterials.org/tools/uguidelines/standards.asp>

<http://www.epa.gov/osw/conservc/rrr/imr/index.htm>

- **Encourage safe reuse and recycling of construction wastes**

Promote reuse and recycling at the 50% (by weight) level for building, road, and bridge project construction and demolition debris wastes. The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification.

http://www.wbdg.org/design/greenspec_msl.php?s=017419

- **Encourage sustainable storm water management at building sites**

Implement site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the building site with regard to the temperature, rate, volume, and duration of flow.

http://cfpub.epa.gov/npdes/home.cfm?program_id=298

Consider designs for storm water management on compacted, contaminated soils in dense urban areas: <http://www.epa.gov/brownfields/publications/swdp0408.pdf>.

- **Encourage cost-efficient, environmentally friendly landscaping**

EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make more holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use.

<http://www.epa.gov/osw/conservc/rrr/greenscapes/index.htm>

- **Incorporate onsite energy generation and energy efficient equipment upgrades into projects at drinking water and wastewater treatment facilities**
 Promote the use of captured biogas in combined heat and power systems and/or renewable energy (wind, solar, etc.) to generate energy for use onsite as well as upgrades to more energy efficient equipment (pumps, motors, etc.)
http://www.epa.gov/waterinfrastructure/bettermanagement_energy.html
- **Encourage land development in brownfield and infill sites**
 Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. These sites are often "infrastructure-ready," eliminating the need to build new roads and utility lines which are necessary in undeveloped land.
<http://www.epa.gov/brownfields/>
- **Use the Integrated Design process on building developments**
 Current procurement practices tend to separate out development into distinct stages that discourage communication across the project lifecycle. The Integrated Design process calls for the active and continuing engagement of all stakeholders throughout the building design, development, and construction phases including the owners, architects, engineers, building department officials, and other professionals. This process can help create a higher performing building at lower costs, allows for various building systems to work together, eliminates redundancy from overdesign and unnecessary capacity, and minimizes change orders during the construction phase. We encourage revising procurement practices so that it can use the Integrated Design process. http://www.wbdg.org/design/engage_process.php
- **Encourage use of Smart Growth and transit oriented development principles**
 Smart Growth and transit oriented development (TOD) principles help preserve natural lands and critical environmental areas, and protect water and air quality by encouraging developments that are walkable and located near public transit.
<http://www.epa.gov/smartgrowth>
- **Ensure environmentally preferable purchasing**
 Promote markets for environmentally preferable products by referencing EPA's multi-attribute Environmentally Preferable Purchasing guidance. <http://www.epa.gov/epp>
- **Purchase 'green' electronics, and measure their benefits**
 Require the purchase of desktop computers, monitors, and laptops that are registered as Silver or Gold products with EPEAT, the Electronics Product Environmental Assessment Tool (www.epeat.net). Products registered with EPEAT use less energy, are easier to recycle, and can be more easily upgraded than non-registered products. Energy savings, CO₂ emission reductions, and other environmental benefits achieved by the purchase, use and recycling of EPEAT-registered products can be quantified using the Electronics Environmental Benefits Calculator (<http://eerc.ra.utk.edu/ccpct/eebc/eebc.html>).

- **Incorporate greener practices into remediation of contaminated sites**
Encourage or incentivize the use of greener remediation practices, including designing treatment systems with optimum energy efficiency; use of passive energy technologies such as bioremediation and phytoremediation; use of renewable energy to meet power demands of energy-intensive treatment systems or auxiliary equipment; use of cleaner fuels, machinery, and vehicles; use of native plant species; and minimizing waste and water use.
<http://clu.in.org/greenremediation/index.cfm>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Public Information Office
186 Exchange Street
Buffalo, New York 14204
Tel: 716/551-4410 Fax: 716/551-4417

EPA Set to Conduct Assessment at Lockport Site

The United States Environmental Protection Agency (EPA) Region 2 will enter a facility at 71 Gooding Street (owned by the City of Lockport, NY) and 2 Clinton Street (owned by Anna Kohl) in Lockport, NY and conduct an inspection and assessment this week.

The site was referred by the EPA Brownfields program in order to determine if it warrants a cleanup under the federal Superfund regulations.

The team that will enter these facilities will be wearing protective clothing and equipment. Once EPA completes the assessment, we will advise you about any future activities at this site.

If you have any further questions, please feel free to call Mike Basile, Public Affairs Specialist, USEPA Region 2 at (716) 551-4410 or via email to basile.michael@epa.gov

FROM :EPA-PIO-----

FAX NO. :7162858788

Apr. 12 2011 11:29AM P1



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 2
FAX HEADER**

TO: Sam Ferraro
Center for Economic Development

Date: Tuesday, April 12, 2011

PHONE: 278-8750
FAX: 278-8757

FROM: Mike Basile
USEPA WNY Public Information Office
186 Exchange Street
Buffalo, NY 14204

Number of Pages
(including header): 2

PHONE: 716-551-4410
FAX: 716-551-4417

SUBJECT: Kohl's Cycle Salvage Site

**** WARNING ****

The attached information may be confidential. It is intended only for the addressee(s) identified above. If you are not the addressee(s) or an employee of the addressee(s), please note that any dissemination, distribution, or copying of this communication is strictly prohibited. If you received this fax in error, please destroy the document and notify the sender of the error. Thank you.



Correspondence Management System

Control Number: R2-13-000-0412-RA

Printing Date: January 11, 2013 01:02:32



Citizen Information

Citizen/Originator: Shapiro, Susan H.

Organization: N/A

Address: 21 Perlman Drive, Spring Valley, NY 10977

Constituent: N/A

Committee: N/A

Sub-Committee: N/A

Control Information

Control Number: R2-13-000-0412-RA

Alternate Number: N/A

Status: Appropriate Action

Closed Date: N/A

Due Date: Jan 28, 2013

of Extensions: 0

Letter Date: Jan 10, 2013

Received Date: Jan 11, 2013

Addressee: R2-Regional Administrator -
Region 2

Addressee Org: EPA

Contact Type: EML (E-Mail)

Priority Code: Normal

Signature: N/A

Signature Date: N/A

File Code: 404-141-02-01_141_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.

Subject: ACOE Wetland Delineation/Jurisdiction Determination - PATRICK FARM PROJECT, Town of Ramapo, Rockland County, New York

Instructions: Action as necessary

Instruction Note: The division determines if a response is necessary. If a response is necessary, please prepare response for Director's signature

General Notes: N/A

CC: R2-CASD - Clean Air and Sustainability Division
R2-ORC - Office of Regional Counsel

Lead Information

Lead Author: Miriam Byrne

Office: R2-CWD-WMB

Due Date: Jan 28, 2013

Assigned Date: Jan 11, 2013

Complete Date: N/A

Instruction: Action as necessary

extension until 2/6/13

Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Danla Boykin	R2	R2-CWD	Jan 11, 2013	Jan 28, 2013	N/A
	Instruction: Action as necessary				
Traci Nefleberg	R2-CWD	R2-CWD-WMB	Jan 11, 2013	Jan 28, 2013	N/A
	Instruction: N/A				

Supporting Information



Correspondence Management System

Control Number: R2-13-000-0412-RA

Printing Date: January 11, 2013 01:02:32



Supporting Author: N/A

Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			

History

Action By	Office	Action	Date
Danla Boykin	R2	Assign R2-CWD as lead office	Jan 11, 2013
Traci Neffleberg	R2-CWD	Accepted the group assignment	Jan 11, 2013
Traci Neffleberg	R2-CWD	Assign R2-CWD-WMB as lead office	Jan 11, 2013
Miriam Byrne	R2-CWD-WMB	Accepted the group assignment	Jan 11, 2013
Miriam Byrne	R2-CWD-WMB	Take task	Jan 11, 2013

Comments

Commentator	Comment	Date
No Record Found.		

MILTON B. SHAPIRO
SUSAN HITO SHAPIRO
Attorneys at Law

21 Perlman Drive
Spring Valley, New York 10977

Phone: 845-371-2100
Fax: 845-371-3721
E-mail: mbs@ourrocklandoffice.com

1/10/13

Ms. Judith Enck
Regional Administrator, Region 2
Environmental Protection Agency
290 Broadway
New York, NY 10007-1866
Fax: (212) 637-3526/ enck.judith@epa.gov

RE: ACOE Wetland Delineation/Jurisdiction Determination
PATRICK FARM PROJECT
Town of Ramapo, Rockland County, New York

Dear Judith:

On 10/27/10, I originally contacted about serious environmental concerns raised by the proposed 497 unit high density multi-family housing project on Patrick Farm which overlays the headwaters and recharge basin of the interstate Ramapo-Mahwah River Basin Sole Source Aquifer System, designated by the US EPA on 8/28/1992 ("SSA") which supplies drinking water, via public and private wells, to more than 1 million people in New York and New Jersey.

On January 16, 2013 the Planning Board of the Town of Ramapo has scheduled Final Site Plan Approval at 6:30 PM (*see attached notice*). Based on historical actions, the Town of Ramapo's Planning Board will grant final approval on January 16, 2013, without question, despite the 12 pending SEQRL lawsuits; and the January 7, 2013 NYS DEC hearing to determine whether an adjudicatory hearing is warranted.

Upon obtaining Ramapo's approval of final subdivision and site plan the Applicant will move quickly to clear cut, re-grade, make impermeable and cause irreparable harm to the pristine re-charge basin at the headwaters of the Ramapo-Mahwah SSA.

Therefore, I am bringing to you attention the recent confirmation from the Army Corps of Engineers (ACOE) that, despite the Applicant's continued assurances, **no approved wetland delineation or Jurisdictional Determination from ACOE exists for the Patrick Farm.**

"[] in response to your Freedom of information Act request regarding all ACOE documents

confirming the delineated and flagged boundaries of all Federal Jurisdictional wetlands on the Patrick Farm site prepared in accordance with methodology provided in 1987 ACOE wetlands Delineation Manual and later editions. This is additional information to documents requested in FOIA FA-13-0035 requested on December 06, 2012.

Please be advised that no Jurisdictional Determination had been done.”
(see the ACOE attached letter dated 1/7/13).

Despite this, the Applicant, Scenic Development, claimed in their EIS and continues to assert, both in writing and at hearings, that ACOE approved their wetland delineation. Therefore, I am putting you and other agencies on notice that due to the Applicant's misrepresentation in the EIS, the Town of Ramapo's SEQR Finding Statement and Review contain inaccurate information and cannot be relied upon by your agency as a basis for any approvals. Numerous permit applications contain the incorrect information regarding approved wetlands delineations.

For example, the ESA waiver application dated January 14, 2011 from CEA Engineer contained false information regarding wetland delineations. On page 3 the Applicant purports to have delineated any wetlands on the site and stated "Both the NYS DEC and the ACOE confirmed and subsequently reconfirmed the wetland delineations." This is entirely false, since no because no such delineation(s) exists.

Due to this misrepresentation the EPA cannot confirm "that the proposed development will not infringe upon delineated wetlands" (see attached letter: 8/18/11 EPA Bricke to RCSewer Phillips)

Therefore, the already granted approvals based on the Applicant's claimed wetland delineation or Jurisdictional Determination should be withdrawn. I am respectfully requesting that you withdraw any approvals immediately and place the Town of Ramapo and the Planning Board on notice of such, prior to the January 16th Planning Board meeting.

Respectfully,



Susan H. Shapiro, Esq.

Cc: Dan Montella, EPA montella.daniel@epa.gov
Steve Ferreiri, EPA ferreiri.steve@epa.gov
John Cantilli, EPA cantilli.john@epa.gov
Judy-Ann Mitchell, EPA mitchell.judy-ann.epa.gov
Michael Sassi, Department of Transportation msassi@dot.state.ny.us
Willie Janeway, NYS DEC wcjanewa@gw.dec.state.ny.us
Scott Ballard, NYS DEC rsballar@gw.dec.state.ny.us
Vincent Altieri, Rockland County Drainage AltieriV@co.rockland.ny.us
Diane Philipps, Rockland County Sewer District No. 1 fax: (845) 365-6686

Dear Sir or Madam:

This letter is to advise you we have an application pending before the **PLANNING BOARD** of the **TOWN OF RAMAPO** concerning property within 500 feet of your property.

This meeting will be held on: Wednesday, January 16, 2013

At: Town of Ramapo, 237 Route 59, Suffern, New York

Time: 8:00 p.m.

We are enclosing a portion of the Legal Notice, which was published in the Rockland County Times, and hope that it will answer your immediate questions concerning the application. Also attached is a drawing showing the proposed site (indicated by the cross hatched area) and the surrounding property (indicated by the lighter area).

There is no requirement that you attend this meeting. However, it is your right to appear to support or object to the case before the **PLANNING BOARD**, or to have a duly authorized representative or attorney appear on your behalf.

Should you have any questions about the application, you may stop by the Town of Ramapo Planning Department and inspect the file. You may also, of course, contact the undersigned to answer your questions.

Scenic Development LLC

Name of Applicant or Representative

Courts have ruled that it is improper for anyone to contact any members of the **PLANNING BOARD** before or after the hearing.

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN that a Public Hearing will be held by the Planning Board of the Town of Ramapo:

At: Town of Ramapo, 237 Route 59, Suffern, New York

Date: Wednesday, January 16, 2013

Time: 8:00 p.m.

LEGAL NOTICE

Application of Scenic Development, LLC, 3 Ashel Lane, Monsey, New York for a Final Site Plan Approval of a drawing entitled Patrick Farm Volunteer Housing consisting of 24 residential rental units for community service volunteers on 5.065 acres. The property in question is located on the east side of Route 202, 0 feet south of Route 306, which is known and designated on the Ramapo Tax Map as Sections 32.11-1-12, 32.11-1-13, 32.11-1-14, 32.11-1-16, 32.11-1-2, 32.11-1-3, 32.11-1-4, 32.15-2-1 and 32.14-2-3, in an R40 and MR8 zones.

Application of Scenic Development, LLC, 3 Ashel Lane, Monsey, New York for a Final Site Plan Approval of a drawing entitled Patrick Farm Condominiums, consisting of 314 market rate Townhouses and 72 "work force flats," on 51.459 acres. The property in question is located on the east side of Route 202, 0 feet south of Route 306, which is known and designated on the Ramapo Tax Map as Sections 32.11-1-12, 32.11-1-13, 32.11-1-14, 32.11-1-16, 32.11-1-2, 32.11-1-3, 32.11-1-4, 32.15-2-1 and 32.14-2-3, in an R40 and MR8 zones.

Copies of the above application are on file at the Town of Ramapo Planning Department and may be reviewed by interested parties during normal office hours.

By Order Of
Town of Ramapo Planning Board Chairman, Sylvain Klein

Dated at Suffern, New York
January 4, 2013

PATRICK FARM -
CONDOMINIUMS SITE

ZONE LINE

RR-80

100 YR
FLOODPLAIN
(EL. 399.6)

MR-8

LOT 88

SITE

R-40

MR-8

LOT 87

PATRICK FARM -
VOLUNTEER
HOUSING SITE

Job number: 09051
Date: 01/04/13
Drawn by: AM
Scale: 1" = 500'

PATRICK FARM
TOWN OF RAMAPO
ROCKLAND COUNTY, NEW YORK
VICINITY MAP

LJA

LEONARD JACKSON ASSOCIATES

EXISTING ENGINEER
28 PROCTOR MEMORIAL DRIVE, POUGHKEEPS, NEW YORK 10986
PHONE: (845) 266-4382 FAX: (845) 266-4481

100

100

100

100



DEPARTMENT OF THE ARMY
NEW YORK DISTRICT, CORPS OF ENGINEERS
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, N.Y. 10278-0090

REPLY TO
ATTENTION OF

JAN 07 2013

Office of Counsel

SUBJECT: Freedom of Information Act Request No. FA-12-0040

Deborah Seidman Munitz
5 Rose Hill Road
Suffern, NY 10901

Dear Ms. Munitz:

This is in response to your Freedom of Information Act request regarding all ACOE documents confirming the delineated and flagged boundaries of all Federal Jurisdictional wetlands on the Patrick Farm site prepared in accordance with methodology provided in 1987 ACOE wetlands Delineation Manual and later editions. This is additional information to documents requested in FOIA FA-13-0035 requested on December 06, 2012.

Please be advised that no Jurisdictional Determination had been done.

A "no records" response is an "adverse determination" under 5 U.S.C. 552(a)(6)(A)(i) since the requester did not receive the documents it requested. Oglesby v. Department of the Army, 920 F2d 57, 67 (D.C. Cir. 1990). As a result, a requester wishing to challenge the adequacy of the search must have the opportunity to appeal a "no records" response to the head of the agency. In the present situation, the undersigned is the Initial Denial Authority for "no records" denial. You have the right to appeal this determination through our office to the Secretary of the Army.

An appeal must be received within 60 days of the date of this letter. The envelope containing the appeal should bear the notation "**Freedom of Information Act Appeal**" and should be sent to:

U.S. Army Engineer District, New York,
ATTN: Office of Counsel, Room 1837
26 Federal Plaza
New York, NY 10278

According to applicable regulations, there are no assessable fees.

Sincerely,

Lorraine Lee
District Counsel
Initial Denial Authority
Freedom of Information Act Officer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 18 2011

Dianne T. Philipps, P.E.
Executive Director
Rockland County Sewer District No. 1
4 Route 340
Orangeburg, New York 10962

Dear Ms. Philipps:

This is in response to your March 22, 2011 request to the U.S. Environmental Protection Agency (EPA) for a waiver from the special condition placed on the Rockland County Sewer District No. 1 construction grant (Project Number C-36-745), restricting sewer connections from new development in environmentally sensitive areas (ESAs). Specifically, this request concerns the "Patrick Farm" subdivision, to be constructed on Tax Lots 3./12A1 (32.11-1-15 & 16), and 3./13A2 (32.11-1-4 & 14 and 32.14-2-3), located in the Town of Ramapo, Rockland County, New York. According to the documentation provided in support of this request, the proposed project involves the construction of 496 residences, including 86 single-family residences and 410 multi-family residences, with associated driveways, sidewalks and roadways, on 208.5 acres.

We have carefully evaluated the information you have provided us. This includes the following plans:

- ◆ "Layout Plan (1 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated May 12, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ◆ "Layout Plan (2 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated May 12, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ◆ "Regulatory Impact Area Map (1 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated June 24, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ◆ "Regulatory Impact Area Map (2 of 2), Patrick Farm: a) Subdivision b) Condominiums c) Volunteer Housing, Town of Ramapo, Rockland County, New York," dated June 24, 2010, last revised on August 12, 2010, and prepared by Leonard Jackson Associates;
- ◆ "Mitigation Plan, Patrick Farm, Town of Ramapo, Rockland County, New York," dated June 29, 2010, last revised on January 28, 2011, and prepared by both Leonard Jackson Associates and Carpenter Environmental Associates, Inc.;

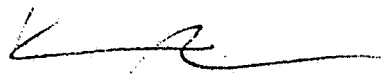
- ♦ "Wetland Location Map, Scenic Development, LLC, Town of Ramapo, Rockland County, New York," dated October 22, 2009, unrevised, and prepared by Atzl, Scatassa & Zigler P.C.; and
- ♦ "Ecological Communities, KLM Properties, City of Ramapo, Rockland County, New York," dated August 24, last revised on June 23, 2010, and prepared by Carpenter Environmental Associates, Inc.

The information provided indicates that the proposed development will not infringe upon delineated wetlands. Therefore, I approve a partial waiver of the grant condition for this project as noted in the above site plans. Please note however, that the sewer connection restriction will remain in effect for the wetlands on this site. Any modification to this project resulting in disturbance to site wetlands will require a resubmittal of this application to the EPA for a revised determination. Moreover, this waiver does not relieve the property owner from compliance with any other federal, state, or local requirements.

As part of a national effort to sustain healthier families, cleaner communities, and a stronger America, EPA would like you to inform the developers, as well as their consultants/contractors, about alternative/green building materials and practices as well as energy- and water-efficient products, and has enclosed *U.S. EPA Region 2 Green Recommendations*. Some of these recommendations are directly applicable to this project while some may be applicable to other projects. Please feel free to share the information.

We commend efforts to use green building/energy-efficient/water-efficient products and would appreciate being made aware of their usage. If you have any questions concerning this matter or would like additional information, please feel free to contact Steven Ferreira of my staff at (212) 637-3759.

Sincerely,



Kevin Bricke, Acting Director
Division of Environmental Planning and Protection

Enclosure

cc: Scenic Development, L.L.C.
Dennis Rocks, Leonard Jackson Associates

U.S. EPA Region 2 Green Recommendations¹

Recommendations:

To the maximum extent possible, projects are encouraged to use local and/or recycled materials; to recycle materials generated onsite; and to utilize low emissions technology and fuels. Further, they should use, to the extent feasible, renewable energy (including, but not limited to solar, wind, geothermal, biogas, and biomass) and energy efficient technology in the design, construction, and operation of transportation, building, and infrastructure projects.

- **ENERGY STAR/Multi-media green building and land design practices**
Require green building practices which have multi-media benefits, including energy efficiency, water conservation, and healthy indoor air quality. Apply building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense for stimulus funded building construction. Third party high-bar, multimedia standards should be required for building construction and land design (LEED and Sustainable Sites Initiative, Collaborative for High Performance Schools (CHPS), or local equivalent).
<http://www.usgbc.org/DisplayPage.aspx?CMSPageID=64>
http://www.energystar.gov/index.cfm?c=business.bus_bldgs
http://www.energystar.gov/index.cfm?c=bldrs_lenders_raters.nh_iap
- **Encourage water conservation in building construction**
Promote the use of water-efficient products to be used in new building construction through the use of WaterSense-labeled products and the use of contractors certified through a WaterSense-labeled program. <http://www.epa.gov/watersense/water/fed-agency.htm>
- **Encourage Low Impact Development to help manage storm water**
Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product. <http://www.epa.gov/nps/lid/>
- **Alternative and Renewable Energy**
The Department of Energy's "Green Power Network" (GPN) provides information and markets that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy.
http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml?state=NJ

¹ "Green" here means environmentally sound practices in general and is not equivalent to the specific "green infrastructure" requirements in the American Recovery and Reinvestment Act (ARRA). Please note that this list is not meant to be all inclusive.

- **Ensure clean diesel practices**

Implement diesel controls, cleaner fuel, and cleaner construction practices for all on- and off-road equipment used for transportation, soil movement, or other construction activities, including:

- 1) Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits;
- 2) Use of ultra low sulfur diesel fuel in nonroad applications ahead of the mandate; and
- 3) Use of the cleanest engines either through add-on control technologies like diesel oxidation catalysts and particulate filters, repowers, or newer, cleaner equipment

Encourage entities to consider adopting contract specifications requiring advanced pollution controls and clean fuels. A model spec is online at (applies to both on and non-road engines):

<http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>

Additional Information: <http://www.epa.gov/diesel/construction/contract-lang.htm>

How to guide: <http://www.mass.gov/dep/air/diesel/connetro.pdf>

- **Promote the use of recycled materials in highway and construction projects**

Many industrial and construction byproducts are available for use in road or infrastructure construction. Use of these materials can save money and reduce environmental impact. The Recycled Materials Resource Center has developed user guidelines for many recycled materials and compiled existing national specifications.

<http://www.recycledmaterials.org/tools/uguidelines/index.asp>

<http://www.recycledmaterials.org/tools/uguidelines/standards.asp>

<http://www.epa.gov/osw/conservetrr/imr/index.htm>

- **Encourage safe reuse and recycling of construction wastes**

Promote reuse and recycling at the 50% (by weight) level for building, road, and bridge project construction and demolition debris wastes. The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification.

http://www.wbdg.org/design/greenspec_msl.php?s=017419

- **Encourage sustainable storm water management at building sites**

Implement site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the building site with regard to the temperature, rate, volume, and duration of flow.

http://cfpub.epa.gov/npdes/home.cfm?program_id=298

Consider designs for storm water management on compacted, contaminated soils in dense urban areas: <http://www.epa.gov/brownfields/publications/swdp0408.pdf>.

- **Encourage cost-efficient, environmentally friendly landscaping**

EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make more holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use.

<http://www.epa.gov/osw/conservetrr/greenscapes/index.htm>

- **Incorporate onsite energy generation and energy efficient equipment upgrades into projects at drinking water and wastewater treatment facilities**
 Promote the use of captured biogas in combined heat and power systems and/or renewable energy (wind, solar, etc.) to generate energy for use onsite as well as upgrades to more energy efficient equipment (pumps, motors, etc.)
http://www.epa.gov/waterinfrastructure/bettermanagement_energy.html
- **Encourage land development in brownfield and infill sites**
 Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. These sites are often "infrastructure-ready," eliminating the need to build new roads and utility lines which are necessary in undeveloped land.
<http://www.epa.gov/brownfields/>
- **Use the Integrated Design process on building developments**
 Current procurement practices tend to separate out development into distinct stages that discourage communication across the project lifecycle. The Integrated Design process calls for the active and continuing engagement of all stakeholders throughout the building design, development, and construction phases including the owners, architects, engineers, building department officials, and other professionals. This process can help create a higher performing building at lower costs, allows for various building systems to work together, eliminates redundancy from overdesign and unnecessary capacity, and minimizes change orders during the construction phase. We encourage revising procurement practices so that it can use the Integrated Design process. http://www.wbdg.org/design/engage_process.php
- **Encourage use of Smart Growth and transit oriented development principles**
 Smart Growth and transit oriented development (TOD) principles help preserve natural lands and critical environmental areas, and protect water and air quality by encouraging developments that are walkable and located near public transit.
<http://www.epa.gov/smartgrowth>
- **Ensure environmentally preferable purchasing**
 Promote markets for environmentally preferable products by referencing EPA's multi-attribute Environmentally Preferable Purchasing guidance. <http://www.epa.gov/epp>
- **Purchase 'green' electronics, and measure their benefits**
 Require the purchase of desktop computers, monitors, and laptops that are registered as Silver or Gold products with EPEAT, the Electronics Product Environmental Assessment Tool (www.epeat.net). Products registered with EPEAT use less energy, are easier to recycle, and can be more easily upgraded than non-registered products. Energy savings, CO₂ emission reductions, and other environmental benefits achieved by the purchase, use and recycling of EPEAT-registered products can be quantified using the Electronics Environmental Benefits Calculator (<http://eerc.ra.utk.edu/ccpct/eebc/eebc.html>).

- **Incorporate greener practices into remediation of contaminated sites**
Encourage or incentivize the use of greener remediation practices, including designing treatment systems with optimum energy efficiency; use of passive energy technologies such as bioremediation and phytoremediation; use of renewable energy to meet power demands of energy-intensive treatment systems or auxiliary equipment; use of cleaner fuels, machinery, and vehicles; use of native plant species; and minimizing waste and water use.
<http://clu.in.org/greenremediation/index.cfm>

